

Appl. No.: 09/846,424
Amdt. dated 04/26/2006
Reply to Office action of January 26, 2006

REMARKS/ARGUMENTS

The amendments above and the remarks below are in response to a non-final Office Action mailed on January 26, 2006 in the above-referenced application, a copy of which is enclosed for your review and records. In the Office Action, Claims 1-29 were rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent No. 6,151,582 to Huang et al. ("Huang") (copy enclosed).

Claim 1 of the present application recites (generally) a supply chain visibility system including 1) graphical user interfaces for presenting a) a configuration panel for displaying an agreed-upon configuration, b) a template panel for displaying a common set of parts to each of a plurality of effectivities, c) a statement of work panel for displaying a required final set of parts for each of the effectivities derived from the common set of parts and d) a shipping entry panel configured to receive shipping status data on actual parts being shipped from the suppliers and needed to complete the required final set of parts; and 2) a processing element for comparing the shipping status data received by the shipment entry panel to the shipping status of the actual parts and updating the shipping status of the actual parts.

Huang discloses a decision support system for the management of an agile supply chain. The decision support system includes a server engine that includes "model engines" that perform analytical processes on the data to determine requirements and make projections for the supply chain. Col. 2, ll. 33-36 of Huang. A client side presents the various view points available in the system to the users. Col. 2, ll. 38-41 of Huang. The decision support system (DSS) 10 includes a DSS database 12, a database management system (DBMS) 14, decision support frames 16 and a user interface 18. Figure 1 of Huang. The system 10 also is configured to interact with supply chain information systems 15.

Where the present invention as recited in the claims supplies information on the actual status of the deliveries of actual parts, Huang discloses a forecasting tool that deals in abstractions and extrapolations from historical data. Huang is directed to predictive supply chain planning in view of the availability of materials and the effects of future promotional activities. These are all forward-looking, predictive activities. Huang is generally not concerned with the tracking of individual actual parts in a supply chain. Huang introduces the intentions of its

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invention in the Background of the Invention section, comparing itself to other predictive models and dismissing those concerned with any aspect of the practicalities of actual shipments and inventory.

Many types of manufacturing database management and inventory control systems exist today. Each of these systems views the process from the narrow viewpoint of the goals of such a system. For example, inventory control processes tend to determine when the inventory of an item is projected to be depleted and when to order goods to prevent such depletion. The inventory control process does not generally take into account the problems associated with availability of materials and machines to satisfy the inventory demand. On the other hand the manufacturing control process considers the availability problem but does not take into account the effect of a sales promotion that will deplete an inventory faster than projected. A marketing department in preparing a sales promotion will often not consider the effect that promotion will have on availability, inventory and profit margin but tends to focus on sales goals. What is needed is a system that will support managers with each of these view points in understanding the effect of the various decisions that can be made on the supply chain as a whole both currently and into the near future.

Col. 1, ll. 22-42 of Huang (emphasis added). Inventory control systems are concerned with actual shipments and Huang dismisses inventory control as not addressing predictive planning needs. Huang also discusses that what is needed is a tool for understanding (predicting) the effect of various decisions currently and in the future.

In the Summary of the Invention, Huang discloses objects of the invention that are focused on predictive models of the future. "It is an object of the present invention to provide a system that allows a decision maker in a supply chain to view the chain from their own perspective and understand the effect that their decisions will have on the supply chain as a whole." Col. 1, ll. 44-47 (emphasis added). Elsewhere in the Summary, Huang discusses "scenario management," "projections," "models" and "forecasts," all demonstrating that Huang is directed to a predictive modeling process and not tracking a supply of actual inventory.

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Other sections of Huang, again, reveal that Huang is directed to a predictive model of supply chain needs and not to the realities of an actual supply chain delivery with actual parts. Huang discloses, for example, that the DSS database 12 contains "synthesized data drawn from a variety of external supply chain information sources." Col. 6, ll. 28-30. Such "synthesized data" would be summary data, not data specific to individual actual parts. Also, Huang notes that the DBMS does not "duplicate the transaction-based functionality that is typically featured in the Supply Chain Information Systems 15, unless it is critical for decision support needs." Col. 6, ll. 40-44. Thus, Huang is not concerned with the realities of tracking the progress of components, but only with the information it needs to project decision-making on future needs.

For the graphical user interfaces, the supply nodes 62 were cited in the Office Action as showing key components 63 supplied by component suppliers. Col. 7, ll. 8-9 of Huang. Similar to Huang's statement at col. 6, ll. 40-44 these "key" components would only be those "critical for decision support needs." In the present invention as recited in Claim 1, each of the actual parts needed to complete the final set of parts is tracked, not just selected "key" parts or parts "critical for decision support needs."

For the final agreed-upon configuration, a vendor managed replenishment (VRM) process was cited in the Office Action. In the VRM process there are contractual agreements between the enterprise and retailers as well as a determination of shipment quantities and replenishment frequencies. Col. 14, lines 9-12 of Huang. These agreements, therefore, deal with quantities and frequencies of parts and not the actual parts needed to complete a required final set of parts, as set forth by independent Claim 1.

Decision models on the DSS database 12 were cited in the Office Action as teaching the template panel displaying the common set of parts. Col. 95, lines 43-46 of Huang. There is no disclosure or suggestion by Huang that these models consider individual actual parts necessary to complete a final set of parts of an assembly, as set forth by independent Claim 1.

For the statement of work panel displaying the shipping status, push planning systems were cited that have a time-phased plan where replenishment is based on the "requirement, schedule receipt and on hand inventory." Col. 98, ll. 46-49 of Huang. Despite Huang's disclosure that on hand inventory is considered, Huang fails to disclose tracking and display of

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the shipping status of individual actual parts needed to complete a required final set of parts as recited in Claim 1. The header for the section in which this citation falls is "Simulation Logic: Process Flow Description." Thus, Huang at best suggests that raw numbers of on hand and expected inventory, non-specific to any individual actual part, are considered in a simulation.

For the shipment entry panel, reading of point-of-sale data to verify inventory status was cited. Col. 42, ll. 40-44 of Huang. For the processing element displaying the shipping status of the parts, maintenance of individual models was cited including "updating and replacement." Col. 39, ll. 27-29 of Huang. Again, for both of these disclosures, Huang does not disclose or suggest that the data or maintenance of the predictive models involves tracking the shipping status of individual actual parts, as recited by independent Claim 1.


For the reasons above, Applicant submits that Huang fails to teach or suggest Claim 1 of the present application. Claim 16 has been amended similar to Claim 1 in regards to the tracking of actual parts to complete a required final set of parts. Thus, Claim 16 is not taught or suggested by Huang for at least the same reasons as described above in conjunction with Claim 1. The remaining Claims 2-15 and 17-29 depend from, and further patentably distinguish, Claims 1 or 16. The rejections of Claims 1-29 under 35 U.S.C. 102(e) have therefore been overcome.

In view of the remarks and amendments presented above, it is respectfully submitted that Claims 1-29 of the present application are in condition for allowance. It is respectfully requested that a Notice of Allowance be issued in due course. The Examiner is requested to contact Applicants' undersigned attorney to resolve any remaining issues in order to expedite examination of the present application.

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It is not believed that extensions of time or fees for net addition of claims are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 CFR § 1.136(a), and any fee required therefore (including fees for net addition of claims) is hereby authorized to be charged to Deposit Account No. 16-0605.

Respectfully submitted,


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